

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO**

UNITED STATES OF AMERICA,

Plaintiff,

No. 2:21-CR-00089-SDM

v.

RONALD BRUST,

Defendant.

**DEFENDANT BRUST'S UNOPPOSED MOTION FOR
MODIFICATION OF PRE-TRIAL RELEASE CONDITIONS**

COMES NOW Defendant Ronald Brust, by and through his attorney of record, David M. Dudley, to move this Honorable Court for a change in his conditions of pre-trial release. More specifically, the defendant requests that this Court adjust condition number 22 of the release order dated April 27, 2021. That condition requires that the defendant live with his brother in Malibu, California as opposed to residing at home by himself at his residence in Las Vegas, Nevada.

In support of that request, the defense would note that, not only has the defendant lived in Las Vegas for over a decade, he has rented the same house

for the past seven years. Attached to this motion is a letter from his landlord, Elan Ackerman, who attests that Brust has been a quality tenant at that location and is current on his rent obligations.

The garage of that residence houses a workshop that Defendant Brust built six years ago to support his business Illuminated Couture LLC. That business produces costumes and other clothing that are adorned with LED lighting. Illuminated Couture has sold its products online and in retail stores around Las Vegas. It has also been commissioned by many of the casinos and entertainment venues in Vegas to produce costumes. Some of its clothing and costumes have been sold to large production companies which have used them in live performances, movies, and television shows.

The workshop itself includes sewing machines, an electrical soldering station, drafting tables, a photo studio, and an area to store supplies. Inside the house, Mr. Brust maintains an office with internet access and a phone line to conduct business.

Due to the pandemic, the business closed temporarily in early 2020 after many years of continuous operation. If allowed to return home, as

Nevada is now fully open for business, the defendant would re-commence immediately the production of costumes and clothing.

Defense counsel has discussed this proposed change in release conditions with Assistant United States Attorney Michael Hunter, attorney of record for the government, and he has no objection to that proposal.

CONCLUSION

For the above reasons, Defendant Brust requests that this Court modify his pre-trial release conditions to allow him to return to his home to Las Vegas, Nevada pending disposition of this case.

DATED: June 12, 2021

s/*David M. Dudley*
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